

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

GREGORY COLBURN et al.,

Defendants.

Case No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S RENEWED OBJECTIONS
TO THE GOVERNMENT'S PROPOSED JURY INSTRUCTIONS**

Pursuant to Fed. R. Crim. P. 30, Defendant John Wilson hereby renews his objections to the government's proposed jury instructions. Mr. Wilson understands that the Court is still considering a number of issues related to the jury instructions that Mr. Wilson raised in his prior filings and during the charge conference. But to the extent the Court has indicated that it will deviate from Mr. Wilson's proposed jury instructions, and instead give instructions that are substantially similar to the Government's proposed jury instructions set forth in ECF Nos. 2014 and 2079, Mr. Wilson respectfully objects. For the reasons set forth in ECF Nos. 2015, 2076, 2077, 2078, 2149, 2341, 2343, 2348, and 2350, which are hereby incorporated by reference, the Court should instead give Mr. Wilson's proposed jury instructions.

Mr. Wilson reserves his right to further object to any instructions the Court ultimately gives to the jury.

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Respectfully submitted,

/s/ Michael Kendall

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DATED: October 6, 2021

CERTIFICATE OF SERVICE

I, Michael Kendall, hereby certify that on October 6, 2021 this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ Michael Kendall